



John McMullan
Middletown Township Manager
27 North Pennell Road
Lima, PA 19037

July 6, 2021

Dear Mr. McMullan,

In relation to the Mariner East 2 project in Middletown Township, we are preparing for pullback activities for the segment between the temporary workspaces at Sleighton Park and Valley Road, referred to as HDD 591. We are requesting a waiver from Middletown Township's Ordinance 155-2 D establishing noise and specific prohibitions for construction to allow us to continue working on pipeline pullback activities beyond the normally permissible hours of 7 a.m. to 9 p.m..

In the horizontal directional drilling (HDD) process, any time pullback operations are stopped for an extended period, there is a risk that it will not be possible to get the pipe moving again due to material packing around the perimeter of the pull section. We raise the concern that without the ability to install the pipe with a continuous pull, there is a higher risk of having to re-start the HDD due to potential degradation of the drilled hole, which would add up to 126 days to our construction timeline.

Continuous work is industry standard practice and is the safest and most efficient method, due to the fact that the integrity of the borehole is best maintained through uninterrupted work.

The HDD 591 segment of the 20-inch pipeline is approximately 4,302 feet in length and is anticipated to be ready for pullback as early as the week of July 12. The pipe will be pulled with the HDD rig staged at the Valley Road workspace, and the pipe section will be staged at Sleighton Park.

Following the completion of the pilot hole and reaming passes, the pullback stage of pipe installation consists of attaching the prefabricated pipe sections and pulling from the exit point (Sleighton Park) back to the drill rig entry point (Valley Road). To increase the chances for a successful HDD installation, a continuous approach is industry standard and offers the highest probability of a successful pullback without having to re-drill.

Due to limited workspace for the pull section to be staged on the exit side, the section cannot be fabricated in one long, continuous segment but rather will require 18 mid-welds during pullback. Pullback operations are further complicated by the restrictive work hours under Middletown Township's ordinance.

There are several factors that will determine the duration of the continuous pullback activities. The scenarios below list the details and risks associated. Please note that the schedule and duration may change due to outside factors, including but not limited to the condition of the bore hole or weather.



Scenario 1: Continuous pullback

The first scenario is the preferred and recommended path forward. With the ability to work continuously outside of 7 a.m. – 9 p.m., the pullback will last approximately 4 days.

Scenario 2: Non-continuous pullback

If the crew must stop work at 9 p.m. each night and wait until 7 a.m. the next morning to restart the pullback, there is a risk that pipe may become unmovable with the HDD rig, in which case we will use contingency measures including a pneumatic hammer to help free the pull section. This methodology of pullback will take 9 days. If our contingency measures are unsuccessful, then the pullback has failed and we must restart the HDD process all over again, which is estimated to take 126 days for the 20-inch pipeline in this section.

In anticipation of continuous pullback activities, we will work with the township to identify and notify neighbors close to the entry and exit points where the work will take place. All Occupational Safety and Health Administration will be followed. We will take certain measures to mitigate noise and lighting in all drill entry and exit locations during non-daylight work.

I thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink that reads "Joseph Massaro".

Joe Massaro
Lead Specialist, Public Affairs
Energy Transfer
100 Green Street
Marcus Hook, PA 19061